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June 13, 2024

**VIA ECF**

Honorable Naomi Reice Buchwald  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Rina Oh n/k/a Rina Oh Amen v. Virginia L. Giuffre*  
Case No.: 1-21-cv-08839 (NRB)

Your Honor:

I am the attorney for the plaintiff in the above referenced matter. This letter is respectfully submitted to the Court, on the consent of Kathleen R. Thomas, Esq. and Jill Roth, Esq., attorneys for the defendant, as a Joint Status Report for this proceeding. At the last conference, the parties advised the Court that the defendant was unable to download the contents of her various Twitter accounts (now known as X), a social media platform, which were suspended and/or previously deleted. Plaintiff indicated that the content of the accounts would be relevant to show the context of the defendant's alleged defamatory statements. Plaintiff had previously served a subpoena on X and received a response containing voluminous objections.

Since the last appearance the defendant retained Brian Wolfinger, an expert in digital forensics, electronic evidence, and electronic discovery tools. On April 29, 2024, plaintiff, counsel for plaintiff, and counsel for defendant held a virtual Microsoft Teams meeting. Mr. Wolfinger attempted to assist the plaintiff with accessing her accounts. The plaintiff accessed each of these accounts on the video chat by sharing her computer screen. Mr. Wolfinger found that despite due diligent efforts, plaintiff, the owner of the accounts, was not able to download her own data. As a result, Mr. Wolfinger crafted a rider to a subpoena, containing specific language and limited in scope, that could be served on X Corp., successor in interest to Twitter, Inc. The subpoena was provided to a process server. I would expect a response to the subpoena during the first week of July, 2024.

Thank you for your consideration.

Respectfully submitted,  
*Alexander Dudelson*  
Alexander M. Dudelson

cc:

**Via ECF**

Kathleen R. Thomas, Esq.

Jill Roth, Esq.